

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF PUERTO RICO**

IN RE:

**MEDICAL EDUCATIONAL AND HEALTH
SERVICE, INC.**

Debtor

**MEDICAL EDUCATIONAL AND HEALTH
SERVICE, INC.**

Plaintiff,
v.

**INDEPENDENT MUNICIPALITY OF
MAYAGUEZ, ET AL.**

Defendants.

Case No. 10-04905 (BKT)

Chapter 11

Adv. Proc. No. 10-00148 (BKT)

Re: Declaratory Judgment,
Collection of Monies and
Injunctive Relief

MOTION IN COMPLIANCE WITH ORDER TO SUBMIT WITNESS LIST

TO THE HONORABLE BRIAN K. TESTER, U.S. BANKRUPTCY JUDGE:

COMES NOW Defendant Orlando Marini Roman, M.D. (hereinafter "OMR")
through his undersigned counsel and respectfully states and prays:

1. On October 27, 2010, this Honorable Court ordered the parties of the above captioned case to furnish a list of all witnesses to be expected to testify in this adversary proceeding to all parties. Docket 29.

2. In compliance with said order, OMR presents the following list of witnesses:

- a. *Dr. Orlando Marini* – May testify about the meetings, agreements, negotiations and transactions between the parties, i.e., MEDHS, his

corporations, the Municipality of Mayaguez (hereinafter “Municipality”) and SISO.

- b. *Dr. Orestes Castellanos* – May testify about the contracts made by MEDHS, SISO and the Municipality. May also testify about the discussions and negotiations with the Municipality in regards to the administration of the Hospital.
- c. *Ivonne Irizarry Valle, Esq.* – May testify about the meetings, discussions and negotiations between MEDHS, SISO and its officials.
- d. *Jaime Rodriguez Cora, Esq.* – May testify about the meetings, discussions and negotiations between MEDHS, SISO and OMR’s corporations.
- e. *Marieli Aviles, Esq.* – Prior counsel of MEDHS. May testify as to the relevant facts of the MEDHS, SISO and the Municipality’s relationship.
- f. *Mr. Carlos Nieves, Esq.* – Attorney for the Municipality. May testify about the meetings, discussions, negotiations and contract between MEDHS and the Municipality.
- g. *Mr. Ivan Millón* – May testify about the meetings, discussions and negotiations with MEDHS and the Municipality.
- h. *Mrs. Adavina Torres Velez* – Accounting Department (SISO).
- i. *Ramfis Velez, Esq.* - May testify about the meetings the parties held on the condition of the hospital.
- j. *Randy Gonzalez Alonso* – May testify about the meetings the parties held on the condition of the hospital.

- k. *Santiago Iturregui, Esq.* - May testify about the meetings, discussions and negotiations between MEDHS and the Municipality.
 - l. *Maria M. Acevedo, Esq.*
 - m. A representative of the Municipality of Mayaguez – May testify about meetings, proceedings, transactions and contracts.
3. OMR reserves the right to call as a witness any other witness announced by other parties.

WHEREFORE, defendant, Orlando Marini Roman, M.D., respectfully requests this Honorable Court to take note of the preceding.

RESPECTFULLY SUBMITTED

In San Juan, Puerto Rico, this 29th day of December, 2010.

I HEREBY CERTIFY: That on this date a true and exact copy of the foregoing document has been filed with the Clerk of the Court using the CM/ECF system, which automatically serves notification of the filing to parties in interest.

O'NEILL & GILMORE, P.S.C.
Legal Counsel for Orlando Marini, M.D.
Citibank Towers, Suite 1701
252 Ponce de León Avenue
San Juan, Puerto Rico 00918-2019
Email: cpg@go-law.com
Tel. 787-620-0670
Fax 787-620-0671

/s/ Charles P. Gilmore
Charles P. Gilmore, Esq.
USDC No. 209614